

**IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

UNITED STATES OF AMERICA,	:	
	:	
Plaintiff,	:	CASE NO: 2:19-cr-53
	:	
v.	:	JUDGE EDMUND A. SARGUS, JR.
	:	
ANDREW K. MITCHELL,	:	
	:	
Defendant.	:	

MOTION OF DEFENDANT
TO CONTINUE PRETRIAL AND TRIAL DATES

Now comes Defendant, Andrew K. Mitchell, by and through counsel, Mark C. Collins, who hereby requests a continuance of the Pretrial and Trial dates. This motion is unopposed by the Government and the Defendant continues to waive time. Reasons for said request are more fully stated in the attached Memorandum in Support.

Respectfully submitted,

/s/ Mark C. Collins
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Attorneys for Defendant Andrew K. Mitchell

MEMORANDUM IN SUPPORT

As the Court is aware, Defense Counsel also represents Mr. Mitchell in *State of Ohio v. Andrew Mitchell*, case; 19 CR 1662, a murder charge, set in front of the Honorable Judge David C. Young, in the Common Pleas Court of Franklin County, as well as the above styled case. For reasons brought upon us by the global pandemic, a continuance was necessary and a Trial date of November 16, 2020 has been set for Mr. Mitchell's pending State case. It is Defense Counsel's belief that it is in Mr. Mitchell's best interest to focus on one matter at a time; that being the murder charge in the 19 CR 1662 case. Assistant United States Attorney, Kevin W. Kelley, is in agreement with the State case proceeding prior to the federal case, and supports this motion. Defendant by and through Counsel hereby again waives speedy trial rights in the above style case.

Respectfully submitted,

/s/ Mark C. Collins

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Attorneys for Defendant Andrew K. Mitchell

CERTIFICATE OF SERVICE

I hereby certify that on August 21, 2020, I electronically filed the Motion to Continue with Judge Edmund A. Sargus, Jr., using the CM/ECF System, which will send notification of such filing to the following: Kevin W. Kelley, Esq.

/s/ Mark C. Collins

MARK C. COLLINS (0061207)